

1 Robert Muller, SBN 189651
bob@cypressllp.com
2 Laura Premi, SBN 211492
laurap@cypressllp.com
3 Douglas Roy SBN 241607
doug@cypressllp.com
4 CYPRESS LLP
11111 Santa Monica Blvd., Suite 500
5 Los Angeles, California 90025
Telephone: (424) 901-0123
6 Facsimile: (424) 750-5100

7 Attorneys for Plaintiffs
Good Technology Corporation and
8 Good Technology Software, Inc.

9
10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA – SAN JOSE DIVISION**

12 **GOOD TECHNOLOGY**
13 **CORPORATION**, a Delaware
14 **corporation, and GOOD**
15 **TECHNOLOGY SOFTWARE, INC., a**
16 **Delaware corporation,**

17 **Plaintiffs,**

18 **v.**

19 **GOOD.CO, INC., a Delaware**
20 **corporation,**

21 **Defendant.**

) **Case No. 3:15-cv-00383-HSG**

) [Hon. Haywood S. Gilliam, Jr.]

) **PLAINTIFFS' NOTICE RE CASE**
) **MANAGEMENT CONFERENCE AND**
) **[PROPOSED] ORDER**

) **Compl. Filed: January 27, 2015**

) **Courtroom: 15**

) **Trial Date: None Set**

CYPRESS LLP
11111 Santa Monica Boulevard Suite 500
Los Angeles, California 90025
(424) 901-0123

CYPRESS LLP
11111 Santa Monica Boulevard Suite 500
Los Angeles, California 90025
(424) 901-0123

1 Plaintiffs Good Technology Corporation and Good Technology Software,
2 Inc. (collectively, "Good") submits the following notice in advance of the
3 scheduled Case Management Statement.

4 Good served its Complaint on January 27, 2015. The Court has scheduled a
5 Case Management Conference for May 5, 2015, at 2:00 p.m.

6 Defendant has not yet been served in this action. Instead, the parties have
7 been negotiating a potential settlement in hopes of avoiding the need for further
8 litigation. Good's current deadline to serve Defendant with the Complaint and
9 Summons is May 27, 2015.

10 Because Defendant has not yet been served, and in order to accommodate
11 the parties' ongoing settlement negotiations, Good respectfully requests that the
12 Court continue the Case Management Conference by 30 days to June 2, 2015, or
13 as soon thereafter as is convenient for the Court. Good further requests that the
14 Court reschedule the deadline for the parties to submit a Joint Case Management
15 Statement to May 26, 2015.

16 Dated: April 30, 2015

CYPRESS LLP

17
18 By: /s/ Doug Roy
19 Doug Roy
20 Attorneys for Plaintiffs
21 Good Technology Corporation and
22 Good Technology Software, Inc.

23 ~~[PROPOSED]~~ ORDER

24 The Case Management Conference in the above-entitled action is continued
25 until June 2, 2015, at 2:00 pm. The parties shall submit a Joint Case Management
26 Statement on or before May 26, 2015.

27 IT IS SO ORDERED.

28 Dated: 5/1/2015

By: Haywood S. Hill, Jr.
UNITED STATES DISTRICT JUDGE